

# SEIDEN | LAW

## VIA ECF

Hon. Victor Marrero  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

November 4, 2023

Re: *Baliga et al. v. Link Motion Inc., et al.* Case No.: 1:18-cv-116420-VM-VF

Dear Judge Marrero,

We write on behalf of Robert Seiden in his capacity as the Court-appointed temporary receiver (“Receiver”) over Link Motion Inc. On November 1, 2023, the Court directed the Receiver and the Plaintiff Wayne Baliga (“Plaintiff”) to respond to Defendant Wenyong Shi’s (“Shi”) Supplemental Objections to the August 11, 2023 Report & Recommendation Regarding the Receiver’s Accounting (“Supplemental Objections”; ECF 494) by November 11, 2023. *See* ECF 495. We write to respectfully request an extension of Receiver and Plaintiff’s time to respond to Shi’s Supplemental Objections from November 11, 2023 to November 30, 2023.

Counsel for Shi consents to this request. Accordingly, the Receiver respectfully requests that the Court grant this extension.

Respectfully submitted,

/s/ Xintong Zhang  
Xintong Zhang

cc: All counsel of record (via ECF).